

SERFF Tracking Number:	ALSX-125395004	State:	Arkansas
Filing Company:	Allstate Property & Casualty Insurance Company	State Tracking Number:	EFT \$25
Company Tracking Number:	R18654		
TOI:	19.0 Personal Auto	Sub-TOI:	19.0001 Private Passenger Auto (PPA)
Product Name:	Private Passenger Auto		
Project Name/Number:	2007 - DeHoyos Appeals Process Filing/R18654		

Filing at a Glance

Company: Allstate Property & Casualty Insurance Company

Product Name: Private Passenger Auto	SERFF Tr Num: ALSX-125395004	State: Arkansas
TOI: 19.0 Personal Auto	SERFF Status: Closed	State Tr Num: EFT \$25
Sub-TOI: 19.0001 Private Passenger Auto (PPA)	Co Tr Num: R18654	State Status: Fees verified and received
Filing Type: Rule	Co Status:	Reviewer(s): Alexa Grissom, Betty Montesi, Brittany Yielding
	Author: SPI AllState	Disposition Date: 05/13/2008
	Date Submitted: 12/20/2007	Disposition Status: Filed
Effective Date Requested (New): 03/10/2008		Effective Date (New): 05/12/2008
Effective Date Requested (Renewal): 03/10/2008		Effective Date (Renewal):
State Filing Description:		

General Information

Project Name: 2007 - DeHoyos Appeals Process Filing	Status of Filing in Domicile: Authorized
Project Number: R18654	Domicile Status Comments:
Reference Organization:	Reference Number:
Reference Title:	Advisory Org. Circular:
Filing Status Changed: 05/13/2008	
State Status Changed: 01/29/2008	Deemer Date:
Corresponding Filing Tracking Number:	
Filing Description:	
Insurance Scoring Appeals Process	

With this filing, Allstate Property & Casualty Insurance Company is implementing an appeals process for Insurance Scoring in the state of Arkansas. The same process will be implemented in all Allstate Group companies and lines that order credit reports for the use of Insurance Scoring in Arkansas. The appeals process will allow consumers whose Insurance Score has been adversely impacted by extraordinary circumstances to appeal the Insurance Score, Allstate

<i>SERFF Tracking Number:</i>	<i>ALSX-125395004</i>	<i>State:</i>	<i>Arkansas</i>
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	<i>Company</i>		
<i>Company Tracking Number:</i>	<i>R18654</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>Private Passenger Auto</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18654</i>		

has previously assigned to them. If an insured meets the criteria listed in the rule, a neutral Insurance Score will be applied to the policy. The conditions under, which an insured may appeal his or her Insurance Score may be found in the attached Rule Pages.

This change will not affect the way Allstate initially assigns an Insurance Score to an insured. There is no rate change associated with this filing.

Effective Date:

New business: March 10, 2008

Renewals: March 10, 2008

Company and Contact

Filing Contact Information

Patrick Torsney,	ptors@allstate.com
2775 Sanders Road	(847) 402-5000 [Phone]
Northbrook, IL 60062	(847) 402-9757[FAX]

Filing Company Information

Allstate Property & Casualty Insurance	CoCode: 17230	State of Domicile: Illinois
Company		
2775 Sanders Road	Group Code: 8	Company Type:
Suite A5		
Northbrook, IL 60062	Group Name: Allstate	State ID Number:
(847) 402-5000 ext. [Phone]	FEIN Number: 36-3341779	

Filing Fees

Fee Required?	Yes
Fee Amount:	\$25.00
Retaliatory?	No
Fee Explanation:	Independent Rule Filings - All P&C Lines = \$25
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Allstate Property & Casualty Insurance Company	\$25.00	12/20/2007	17194395

SERFF Tracking Number:	ALSX-125395004	State:	Arkansas
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Product Name:	Private Passenger Auto		
Project Name/Number:	2007 - DeHoyos Appeals Process Filing/R18654		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Alexa Grissom	05/13/2008	05/13/2008
Filed	Alexa Grissom	03/04/2008	03/04/2008

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Alexa Grissom	02/15/2008	02/15/2008	SPI AllState	02/28/2008	02/28/2008
Pending Industry Response	Alexa Grissom	01/23/2008	01/23/2008	SPI AllState	02/07/2008	02/07/2008
Pending Industry Response	Alexa Grissom	01/03/2008	01/03/2008	SPI AllState	01/16/2008	01/16/2008

Amendments

Item	Schedule	Created By	Created On	Date Submitted
new manual pages	Supporting Document	SPI AllState	05/12/2008	05/12/2008

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
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New effective dates.	Note To Reviewer	SPI AllState	04/29/2008 04/29/2008
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<i>SERFF Tracking Number:</i>	<i>ALSX-125395004</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Property & Casualty Insurance</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
	<i>Company</i>		
<i>Company Tracking Number:</i>	<i>R18654</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>Private Passenger Auto</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18654</i>		

Disposition

Disposition Date: 05/13/2008

Effective Date (New): 05/12/2008

Effective Date (Renewal):

- Effective Date (Renewal) changed from NULL to 05/12/2008 by Grissom, Alexa on 05/05/2008.

Status: Filed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: ALSX-125395004 State: Arkansas

Filing Company: Allstate Property & Casualty Insurance State Tracking Number: EFT \$25
Company

Company Tracking Number: R18654

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Private Passenger Auto

Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

Item Type	Item Name	Item Status	Public Access
Supporting Document	APCS-Auto Premium Comparison Survey	Filed	Yes
Supporting Document	NAIC loss cost data entry document	Filed	Yes
Supporting Document	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Filed	Yes
Supporting Document	Uniform Transmittal Document-Property & Casualty	Filed	Yes
Supporting Document	Response to DOI Objection	Filed	Yes
Supporting Document	Response obj 2	Filed	Yes
Supporting Document	DOI Obj #3	Filed	Yes
Supporting Document	new manual pages	Filed	Yes
Rate	CheckingList_R18654	Filed	Yes
Rate	Manual_R18654	Filed	Yes

<i>SERFF Tracking Number:</i>	<i>ALSX-125395004</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Property & Casualty Insurance</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
	<i>Company</i>		
<i>Company Tracking Number:</i>	<i>R18654</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>Private Passenger Auto</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18654</i>		

Disposition

Disposition Date: 03/04/2008

Effective Date (New): 03/10/2008

Effective Date (Renewal): 05/12/2008

Status: Filed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: ALSX-125395004 State: Arkansas

Filing Company: Allstate Property & Casualty Insurance State Tracking Number: EFT \$25
Company

Company Tracking Number: R18654

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Private Passenger Auto

Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

Item Type	Item Name	Item Status	Public Access
Supporting Document	APCS-Auto Premium Comparison Survey	Filed	Yes
Supporting Document	NAIC loss cost data entry document	Filed	Yes
Supporting Document	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Filed	Yes
Supporting Document	Uniform Transmittal Document-Property & Casualty	Filed	Yes
Supporting Document	Response to DOI Objection	Filed	Yes
Supporting Document	Response obj 2	Filed	Yes
Supporting Document	DOI Obj #3	Filed	Yes
Supporting Document	new manual pages	Filed	Yes
Rate	CheckingList_R18654	Filed	Yes
Rate	Manual_R18654	Filed	Yes

SERFF Tracking Number: ALSX-125395004 State: Arkansas
Filing Company: Allstate Property & Casualty Insurance State Tracking Number: EFT \$25
Company
Company Tracking Number: R18654
TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)
Product Name: Private Passenger Auto
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 02/15/2008
Submitted Date 02/15/2008

Respond By Date

Dear Patrick Torsney,

This will acknowledge receipt of the captioned filing. Our Director has advised that not-at-fault accidents may not be utilized in tiering.

Additionally, "on or after 03/01/08 may, at Allstate's sole discretion," should be removed from the filing. The subsequent reassignment must be to the "neutral" tier from the credit perspective.

Please feel free to contact me if you have questions.

Sincerely,

Alexa Grissom

Response Letter

Response Letter Status Submitted to State
Response Letter Date 02/28/2008
Submitted Date 02/28/2008

Dear Alexa Grissom,

Comments:

Response to 2/15/8 objection letter.

Response 1

Comments: Please see attached document re: 2/15/8 objection letter.

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: DOI Obj #3

Comment:

State: *Arkansas*

State Tracking Number: EFT \$25

Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

No Rate/Rule Schedule items changed.

Sincerely,
SPI AllState

<i>SERFF Tracking Number:</i>	<i>ALSX-125395004</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Property & Casualty Insurance</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
	<i>Company</i>		
<i>Company Tracking Number:</i>	<i>R18654</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>Private Passenger Auto</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18654</i>		

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	01/23/2008
Submitted Date	01/23/2008
Respond By Date	
Dear Patrick Torsney,	

This will acknowledge receipt of the correspondence regarding the captioned filing. Please advise if not-at-fault accidents are considered in tiering and/or rating. If so, per our Director, they should be removed.

Please feel free to contact me if you have questions.

Sincerely,
Alexa Grissom

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	02/07/2008
Submitted Date	02/07/2008

Dear Alexa Grissom,

Comments:

Response to 1/23/8 objection.

Response 1

Comments: Please see attached document re: 1/23/8 objection.

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Response obj 2

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
SPI AllState

SERFF Tracking Number: ALSX-125395004 State: Arkansas
Filing Company: Allstate Property & Casualty Insurance State Tracking Number: EFT \$25
Company
Company Tracking Number: R18654
TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)
Product Name: Private Passenger Auto
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 01/03/2008
Submitted Date 01/03/2008
Respond By Date
Dear Patrick Torsney,

This will acknowledge receipt of the captioned filing. In the transmittal document, mention is made of an appeals process. However, in the manual it states at Allstate's discretion an insured may be moved to a better tier or group. Please clarify. Additionally, what other factors determine a tier or group?

Please feel free to contact me if you have questions.

Sincerely,
Alexa Grissom

Response Letter

Response Letter Status Submitted to State
Response Letter Date 01/16/2008
Submitted Date 01/16/2008

Dear Alexa Grissom,

Comments:

Response to 1/3/8 objection

Response 1

Comments: Please see attached document re: 1/3/8 objection

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Response to DOI Objection

Comment:

State: Arkansas

State Tracking Number: EFT \$25

Company Tracking Number: R18654

Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Private Passenger Auto

Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Please contact me at 847 402 7309 or at ptors@allstate.com if you have any questions. Thank you, Patrick Torsney

Sincerely,
SPI AllState

SERFF Tracking Number: ALSX-125395004 State: Arkansas
Filing Company: Allstate Property & Casualty Insurance State Tracking Number: EFT \$25
Company
Company Tracking Number: R18654
TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)
Product Name: Private Passenger Auto
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

Amendment Letter

Amendment Date:
Submitted Date: 05/12/2008

Comments:

Here is the updated manual pages

Changed Items:

Supporting Document Schedule Item Changes:

User Added -Name: new manual pages

Comment:
new manual pages.PDF

SERFF Tracking Number:	ALSX-125395004	State:	Arkansas
Filing Company:	Allstate Property & Casualty Insurance	State Tracking Number:	EFT \$25
	Company		
Company Tracking Number:	R18654		
TOI:	19.0 Personal Auto	Sub-TOI:	19.0001 Private Passenger Auto (PPA)
Product Name:	Private Passenger Auto		
Project Name/Number:	2007 - DeHoyos Appeals Process Filing/R18654		

Note To Reviewer

Created By:

SPI AllState on 04/29/2008 02:22 PM

Subject:

New effective dates.

Comments:

The new effective dates for this filing for new and renewal business is 5/12/8

<i>SERFF Tracking Number:</i>	<i>ALSX-125395004</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Property & Casualty Insurance</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
	<i>Company</i>		
<i>Company Tracking Number:</i>	<i>R18654</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>Private Passenger Auto</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18654</i>		

Rate Information

Rate data does NOT apply to filing.

<i>SERFF Tracking Number:</i>	<i>ALSX-125395004</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Property & Casualty Insurance</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
	<i>Company</i>		
<i>Company Tracking Number:</i>	<i>R18654</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>Private Passenger Auto</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18654</i>		

Rate/Rule Schedule

Review Status:	Exhibit Name:	Rule # or Page #:	Rate Action	Previous State Filing Attachments Number:
Filed	CheckingList_R18654	R18654	New	R18654.PDF
Filed	Manual_R18654	R18654	Replacement	R18654.PDF

CHECKING LIST FOR PRIVATE PASSENGER AUTO

Printing dates are shown on each page to facilitate identification of different editions, but have no direct connection with the effective date of the page.

RULES

Enclosed: Page 23-2 dated 1-1-2008

Withdrawn: Page 23-2 dated 7-1-2005

RULE 23 – POLICY GROUP

Each policy will be assigned to a Policy Group based on the Insurance Score assigned when the credit report(s) ordered in connection with the policy were requested.

A. INITIAL POLICY GROUP ASSIGNMENT

For Policy Group assignment on or after 9/19/2005:

<u>Policy Group</u>	<u>Insurance Score</u>
1	0-381
2	382-388
3	389-395
4	396-402
5	403-409
6	410-417
7	418-425
8	426-433
9	434-446
10	447-460
11	461-476
12	477-490
13	491-506
14	507-524
15	525-546
16	547-999

With respect to credit reports requested on and after 9/19/2005 where a credit report cannot be obtained, or where a credit report consists only of inquiries, an Insurance Score will be assigned based on the age of the individual at the time of the credit report request as follows:

<u>Age</u>	<u>Insurance Score</u>
Less than 19 years old	455
19 – 64 years old	505
65 years old or older	430

The policy of any insured whose credit report was ordered by Allstate Property and Casualty Insurance Company for the purpose of Policy Group determination pursuant to this rule on or after 03/10/08 may, at Allstate's sole discretion, be assigned to Policy Group 8 retroactive to the most recent effective date of the policy, if such insured provides proof acceptable to Allstate that his or her credit information has been negatively impacted by any of the following extraordinary circumstances: divorce; death of a spouse or member of the same household; involuntary unemployment; catastrophic medical expense; care of adult dependent; identity theft; long-term injury, illness or disability; care of a dependent grandchild; or domestic violence.

B. SUBSEQUENT POLICY GROUP ASSIGNMENT

At each renewal, the same Policy Group will continue to apply unless at renewal one of the following applies:

1. Prior to every 2nd renewal effective date following the effective date of the policy for which credit report(s) were most recently ordered to determine the applicable Tier and only at the named insured's request, a new credit report(s) will be obtained for all applicable insureds on the policy at the time of reorder. The reorder will be done according to the procedure regarding ordering of credit reports that is in effect for Allstate Property and Casualty Insurance Company at the time of the reorder. If an insured requests a reorder, the next opportunity to request a reorder will take place prior to the 2nd renewal effective date following the effective date of the policy for which the credit report(s) was most recently ordered to determine the applicable Tier.

The policy of any insured whose credit report was ordered by Allstate Property and Casualty Insurance Company for the purpose of Policy Group determination pursuant to this rule on or after 03/10/08 may, at Allstate's sole discretion, be assigned to Policy Group 8 retroactive to the most recent effective date of the policy, if such insured provides proof acceptable to Allstate that his or her credit information has been negatively impacted by any of the following extraordinary circumstances: divorce; death of a spouse or member of the same household; involuntary unemployment; catastrophic medical expense; care of adult dependent; identity theft; long-term injury, illness or disability; care of a dependent grandchild; or domestic violence.

C. CREDIT REPORT REORDERS

In the event it is necessary to reorder any credit report(s) other than for reasons listed in Section B above, all credit reports needed to assign the policy to a Policy Group will be reordered. New credit report(s) will be obtained for all applicable insureds on the policy at the time of the reorder, according to the procedure regarding ordering of credit reports that is in effect for Allstate Property and Casualty Insurance Company at the time of the reorder, and the applicable Policy Group will be assigned as determined in Section A.

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Product Name:	Private Passenger Auto		
Project Name/Number:	2007 - DeHoyos Appeals Process Filing/R18654		

Supporting Document Schedules

Bypassed -Name:	APCS-Auto Premium Comparison Survey	Review Status:	Filed	03/04/2008
Bypass Reason:	N/A - This is a rule only filing.			
Comments:				

Bypassed -Name:	NAIC loss cost data entry document	Review Status:	Filed	03/04/2008
Bypass Reason:	N/A - Loss costs are not relevant to this filing			
Comments:				

Bypassed -Name:	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Review Status:	Filed	03/04/2008
Bypass Reason:	N/A - Loss costs are not relevant to this filing			
Comments:				

Satisfied -Name:	Uniform Transmittal Document-Property & Casualty	Review Status:	Filed	03/04/2008
Comments:				
Attachment:	AR - NAIC P&C TRANSMITTAL DOCUMENT.PDF			

Satisfied -Name:	Response to DOI Objection	Review Status:	Filed	03/04/2008
Comments:				
Attachment:	Response to DOI Objection.PDF			

Review Status:

<i>SERFF Tracking Number:</i>	<i>ALSX-125395004</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Property & Casualty Insurance</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
	<i>Company</i>		
<i>Company Tracking Number:</i>	<i>R18654</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>Private Passenger Auto</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18654</i>		
Satisfied -Name:	Response obj 2	Filed	03/04/2008
Comments:			
Attachment:			
Response obj 2.PDF			

SERFF Tracking Number: ALSX-125395004 State: Arkansas
Filing Company: Allstate Property & Casualty Insurance State Tracking Number: EFT \$25
Company
Company Tracking Number: R18654
TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)
Product Name: Private Passenger Auto
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18654

Review Status:
Satisfied -Name: DOI Obj #3 Filed 03/04/2008
Comments:
Attachment:
DOI Obj #3.PDF

Review Status:
Satisfied -Name: new manual pages Filed 05/13/2008
Comments:
Attachment:
new manual pages.PDF


Property & Casualty Transmittal Document

1. Reserved for Insurance Dept. Use Only	2. Insurance Department Use only	
	a. Date the filing is received:	
	b. Analyst:	
	c. Disposition:	
	d. Date of disposition of the filing:	
	e. Effective date of filing:	
	New Business	
	Renewal Business	
	f. State Filing #:	
g. SERFF Filing #:		
h. Subject Codes		

3. Group Name	Allstate				Group NAIC #	008
4. Company Name(s)	Domicile	NAIC #	FEIN #	State #		
Allstate Property & Casualty Insurance Company	IL	17230	36-3341779			

5. Company Tracking Number	R18654
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Contact Info of Filer(s) or Corporate Officer(s) [include toll-free number]

6. Name and address	Title	Telephone #s	FAX #	e-mail
Patrick Torsney 2775 Sanders Road, Suite A5 Northbrook IL 60062		800-366-2958 Ext. 27309	847-402-9757	ptors@allstate.com
7. Signature of authorized filer				
8. Please print name of authorized filer	Patrick Torsney			

Filing Information (see General Instructions for descriptions of these fields)

9. Type of Insurance (TOI)	19.0 Personal Auto
10. Sub-Type of Insurance (Sub-TOI)	19.0001 Private Passenger Auto (PPA)
11. State Specific Product code(s) (if applicable) [See State Specific Requirements]	N/A
12. Company Program Title (Marketing Title)	Private Passenger Auto
13. Filing Type	<input type="checkbox"/> Rate/Loss Cost <input checked="" type="checkbox"/> Rules <input type="checkbox"/> Rates/Rules <input type="checkbox"/> Forms <input type="checkbox"/> Combination Rates/Rules/Forms <input type="checkbox"/> Withdrawal <input type="checkbox"/> Other (give description)
14. Effective Date(s) Requested	New: 03/10/2008 Renewal: 03/10/2008
15. Reference Filing?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
16. Reference Organization (if applicable)	N/A
17. Reference Organization # & Title	N/A
18. Company's Date of Filing	12/20/07
19. Status of filing in domicile	<input type="checkbox"/> Not Filed <input type="checkbox"/> Pending <input checked="" type="checkbox"/> Authorized <input type="checkbox"/> Disapproved

Property & Casualty Transmittal Document

20.	This filing transmittal is part of Company Tracking #	R18654
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21.	Filing Description [This area can be used in lieu of a cover letter or filing memorandum and is free-form text]
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Insurance Scoring Appeals Process

With this filing, Allstate Property & Casualty Insurance Company is implementing an appeals process for Insurance Scoring in the state of Arkansas. The same process will be implemented in all Allstate Group companies and lines that order credit reports for the use of Insurance Scoring in Arkansas. The appeals process will allow consumers whose Insurance Score has been adversely impacted by extraordinary circumstances to appeal the Insurance Score, Allstate has previously assigned to them. If an insured meets the criteria listed in the rule, a neutral Insurance Score will be applied to the policy. The conditions under, which an insured may appeal his or her Insurance Score may be found in the attached Rule Pages.

This change will not affect the way Allstate initially assigns an Insurance Score to an insured. There is no rate change associated with this filing.

Effective Date:

New business: March 10, 2008

Renewals: March 10, 2008

22.	Filing Fees (Filer must provide check # and fee amount if applicable.) [If a state requires you to show how you calculated your filing fees, place that calculation below]
	<p>Check #: N/A - Paid via EFT.</p> <p>Amount: \$25.00</p> <p>Independent Rule Filings - All P&C Lines = \$25</p>
<p>Refer to each state's checklist for additional state specific requirements or instructions on calculating fees.</p>	

***Refer to each state's checklist for additional state specific requirements (i.e. # of additional copies required, other state specific forms, etc.)

**ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY
VOLUNTARY PRIVATE PASSENGER AUTO
ARKANSAS**

Response to letter dated January 3, 2008 regarding Filing #R18654

- 1. In the transmittal document, mention is made of an appeals process. However, in the manual it states at Allstate's discretion an insured may be moved to a better tier or group. Please clarify. Additionally, what other factors determine a tier or group?**

On Page 23-2 of the Allstate Property & Casualty Insurance Company (AP&C) Private Passenger Auto Insurance Manual, the first paragraph states that, at Allstate's discretion, a policyholder may be assigned to Policy Group 8 retroactive to the most recent effective date of the policy, if such insured provides proof acceptable to Allstate that his or her credit information has been negatively impacted by the listed extraordinary circumstances. The appeals process mentioned in the transmittal refers to the process an insured would use to provide proof that his or her credit information has been negatively impacted by the listed extraordinary circumstances. Provided the insured's appeal meets the criteria detailed in the rule, at Allstate's sole discretion, the insured will be assigned to Policy Group 8 retroactive to the most recent effective date of the policy.

Initial tier determination for an insured is based on an assigned row number and policy group number. The following criteria determine an insured's row number: Years with Prior Carrier, Ownership of Residential Property, Prior Bodily Injury Limit, and New Business Lapse. Please see Rule 57 in the AP&C Private Passenger Auto Insurance Manual for more details on these criteria as well as subsequent assigned row determination. For convenience, the content of Rule 57 is included following this response. Please note that the Rule is included for reference; no content in this Rule has been changed.

An insured's initial policy group number is assigned based on the Insurance Score assigned when the credit report(s) ordered in connection with the policy were requested. Determination of subsequent policy group assignment as well as exceptions to the policy group assignment structure can be found in Rule 23 in the AP&C Private Passenger Auto Insurance Manual.

An insured's tier determination is then based on the combination of his or her assigned row number and assigned policy group number. A table detailing the Policy Tiers associated with these combinations can be found in Rule 57 in the AP&C Private Passenger Auto Insurance Manual. Rule 57 also details the process of subsequent tier determination.

RULE 57 – TIER DETERMINATION - COVERAGES AA, BB, VC, DD, HH, & NC

Each policy shall be assigned a Tier based upon the criteria below. At each renewal, the same tier will continue to apply unless the policy qualifies for a different tier under Section B of this rule. This rule applies to Private Passenger Automobiles and Utility Automobiles.

A. INITIAL TIER DETERMINATION**1. Determination of Policy Row Number**

Each policy will be assigned a Row number based on the table below. Definitions for the four qualifiers follow the table.

<u>Row Number</u>	<u>Years with Prior Carrier</u>	<u>Ownership of Residential Property</u>	<u>Prior Bodily Injury Limit*</u>	<u>New Business Lapse</u>
1	5+	Yes	>100/300	No
2	5+	Yes	<= 100/300 and > 25/50	No
3	5+	Yes	<= 25/50	No
4	5+	No	>100/300	No
5	5+	No	<= 100/300 and > 25/50	No
6	5+	No	<= 25/50	No
7	0-4	Yes	>100/300	No
8	0-4	Yes	<= 100/300 and > 25/50	No
9	0-4	Yes	<= 25/50	No
10	0-4	No	>100/300	No
11	0-4	No	<= 100/300 and > 25/50	No
12	0-4	No	<= 25/50	No
13	5+	Yes	>100/300	Yes
14	5+	Yes	<= 100/300 and > 25/50	Yes
15	5+	Yes	<= 25/50	Yes
16	5+	No	>100/300	Yes
17	5+	No	<= 100/300 and > 25/50	Yes
18	5+	No	<= 25/50	Yes
19	0-4	Yes	>100/300	Yes
20	0-4	Yes	<= 100/300 and > 25/50	Yes
21	0-4	Yes	<= 25/50	Yes
22	0-4	No	>100/300	Yes
23	0-4	No	<= 100/300 and > 25/50	Yes
24	0-4	No	<= 25/50	Yes

* If the Bodily Injury Limit from the prior carrier is a Combined Single Limit, the Combined Single Limit should be compared to the per accident portion of the limits listed in the table.

a. Years with Prior Carrier

Years with Prior Carrier is defined as the maximum number of years immediately preceding the inception of the Allstate Property and Casualty Insurance Company policy in which either of the first two named insureds (if applicable) have held continuous automobile liability insurance with that carrier.

Notes:

- i. If the prior carrier was involved in a merger or acquisition or changed its name, the number of years insured with the prior carrier is the combined years of continuous automobile liability insurance with any carrier involved in such merger, acquisition or name change.
- ii. Military personnel returning from active duty will be defined to have had continuous prior insurance if:
 1. they had liability insurance coverage in good standing at the time of leaving for active duty, and
 2. can show proof that such active duty was the reason for the loss of continuity of insurance coverage

In these cases, the number of years insured with the prior carrier will be the sum of the number of years with the prior carrier as defined above prior to deployment plus the length of time deployed overseas.

b. Prior Bodily Injury Limit

The Bodily Injury limit from the prior carrier is the greater of liability limits immediately preceding the inception of the Allstate Property and Casualty Insurance Company policy of either of the first two named insureds (if applicable) for bodily injury to, or death of, each person as a result of any one accident.

c. Ownership of a Residential Property

A policy will satisfy this requirement if the named insured or spouse owns a residential property.

Note: The residence does not need to be occupied by the named insured or spouse to satisfy the requirement.

d. Lapse at New Business

A policyholder will be considered to have a lapse at New Business if there is a lapse of 1 day or more between the expiration date of the prior policy and the New Business Effective date of the Allstate Property and Casualty Insurance Company policy.

Note: Military personnel returning from active duty will be defined to have had no lapse at new business if:

1. they had liability insurance coverage in good standing at the time of leaving for active duty, and
2. can show proof that such active duty was the reason for the loss of continuity of insurance coverage

2. Determination of Policy Tier

Based on the Policy Group determined in Rule 23-Policy Group and the Row number determined in Section A.1, each policy will be assigned a Tier corresponding to the table below.

Row Number	Policy Group															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	1	25	49	73	97	121	145	169	193	217	241	265	289	313	337	361
2	2	26	50	74	98	122	146	170	194	218	242	266	290	314	338	362
3	3	27	51	75	99	123	147	171	195	219	243	267	291	315	339	363
4	4	28	52	76	100	124	148	172	196	220	244	268	292	316	340	364
5	5	29	53	77	101	125	149	173	197	221	245	269	293	317	341	365
6	6	30	54	78	102	126	150	174	198	222	246	270	294	318	342	366
7	7	31	55	79	103	127	151	175	199	223	247	271	295	319	343	367
8	8	32	56	80	104	128	152	176	200	224	248	272	296	320	344	368
9	9	33	57	81	105	129	153	177	201	225	249	273	297	321	345	369
10	10	34	58	82	106	130	154	178	202	226	250	274	298	322	346	370
11	11	35	59	83	107	131	155	179	203	227	251	275	299	323	347	371
12	12	36	60	84	108	132	156	180	204	228	252	276	300	324	348	372
13	13	37	61	85	109	133	157	181	205	229	253	277	301	325	349	373
14	14	38	62	86	110	134	158	182	206	230	254	278	302	326	350	374
15	15	39	63	87	111	135	159	183	207	231	255	279	303	327	351	375
16	16	40	64	88	112	136	160	184	208	232	256	280	304	328	352	376
17	17	41	65	89	113	137	161	185	209	233	257	281	305	329	353	377
18	18	42	66	90	114	138	162	186	210	234	258	282	306	330	354	378
19	19	43	67	91	115	139	163	187	211	235	259	283	307	331	355	379
20	20	44	68	92	116	140	164	188	212	236	260	284	308	332	356	380
21	21	45	69	93	117	141	165	189	213	237	261	285	309	333	357	381
22	22	46	70	94	118	142	166	190	214	238	262	286	310	334	358	382
23	23	47	71	95	119	143	167	191	215	239	263	287	311	335	359	383
24	24	48	72	96	120	144	168	192	216	240	264	288	312	336	360	384

B. SUBSEQUENT TIER DETERMINATION

The same Tier will continue to apply unless at renewal one of the following applies:

2. Change to Policy Group

At renewal, the policy's Tier will be reassigned if the policy is reassigned to a new Policy Group pursuant to Rule 23-Policy Group. The applicable Tier will be reassigned by locating the appropriate entry on the table in Section A.2 corresponding to the Policy Group and Row number.

3. Change to Policy Row Number

The Policy Row number will continue to apply, unless one of the following applies:

a. Bodily Injury Limit

At renewal, the policy's Row number will be reassigned if the Bodily Injury limit was increased to that of a different segment of Prior Bodily Injury Limits and was maintained for five consecutive years. The applicable Row number will be reassigned pursuant to the table in Section A.1. The applicable Tier will be reassigned by locating the appropriate entry in the table in Section A.2 corresponding to the Policy Group and Row number.

b. Ownership of Residential Property

- i. If the named insured or spouse has become the owner of residential property, and the policy had not previously satisfied this requirement, the policy's Row number will be reassigned. The applicable Row number will be reassigned pursuant to the table in Section A.1. The applicable Tier will be reassigned by locating the appropriate entry in the table in Section A.2 corresponding to the Policy Group and Row number. Reassignment will be effective on the later of the last policy effective date or the purchase date of the residential property.

Note: The residence does not need to be occupied by the named insured or spouse to satisfy the requirement.

- ii. If the named insured or spouse no longer satisfies the requirement of ownership of residential property, the policy's Row number will be reassigned at renewal. The applicable Row number will be reassigned pursuant to the table in Section A.1. The applicable Tier will be reassigned by locating the appropriate entry in the table in Section A.2 corresponding to the Policy Group and Row number.

**ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY
PRIVATE PASSENGER AUTO
ARKANSAS**

Response to letter dated January 23, 2008 regarding Filing #R18654

- 1. Please advise if not-at-fault accidents are considered in tiering and/or rating. If so, per our Director, they should be removed.**

Allstate would like to further investigate the issue of not-at-fault accidents in rating in accordance with Arkansas Code Ann. 23-79-152.

As this is unrelated to the original intent of the filing, Allstate would like to respectfully request a separation of these issues. Since the implementation of this appeals process is in the best interest of insureds, if there are no further questions, Allstate requests that the initial filing be approved. At the same time, Allstate will continue to investigate the issue of not-at-fault accidents as it relates to Arkansas Code Ann. 23-79-152 and respond accordingly.

**ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY
PRIVATE PASSENGER AUTO
ARKANSAS**

Response to letter dated February 19, 2008 regarding Filing #R18654

- 1. Our Director has advised that not-at-fault accidents may not be utilized in tiering. Additionally, “on or after 03/10/08 may, at Allstate’s sole discretion,” should be removed from the filing. The subsequent reassignment must be to the “neutral” tier from the credit perspective.”**

Allstate advises that not-at-fault accidents are not utilized in tiering for policyholders in Allstate Property & Casualty Insurance Company. Not-at-fault accidents are considered solely for the purpose of a discount application.

Allstate is aware of the requirements of Ark. Code Ann. 23-67-405 to 415, and believe our current procedures comply with the requirement. This law requires that we have a process to rerate any customer whose credit information is corrected as a result of the dispute resolution process at the Credit Reporting Agency. We have such a process in place and this process did begin prior to January 1, 2004 when this law became effective. We are now proposing an additional process where a customer may appeal their assignment based upon extraordinary circumstances which have affected their credit report. This process works in addition to, not in place of our current correction process, and allow for customers to make an appeal even though the information present on their credit report is actually correct. Because this is a new process in Arkansas, and goes beyond the requirements of Ark. Code Ann. 23-67-405 to 415, we plan to implement this process on a prospective basis and thus we have proposed an effective date of 3/10/08.

For those who provide sufficient information to demonstrate their extraordinary circumstance, the subsequent reassignment will be to the neutral tier from a credit perspective. Due to the nature of this process, Allstate must be in the position of reviewing and determining the documentation provided by the customer to support their case for an appeal.

RULE 23 – POLICY GROUP

Each policy will be assigned to a Policy Group based on the Insurance Score assigned when the credit report(s) ordered in connection with the policy were requested.

A. INITIAL POLICY GROUP ASSIGNMENT

For Policy Group assignment on or after 9/19/2005:

<u>Policy Group</u>	<u>Insurance Score</u>
1	0-381
2	382-388
3	389-395
4	396-402
5	403-409
6	410-417
7	418-425
8	426-433
9	434-446
10	447-460
11	461-476
12	477-490
13	491-506
14	507-524
15	525-546
16	547-999

With respect to credit reports requested on and after 9/19/2005 where a credit report cannot be obtained, or where a credit report consists only of inquiries, an Insurance Score will be assigned based on the age of the individual at the time of the credit report request as follows:

<u>Age</u>	<u>Insurance Score</u>
Less than 19 years old	455
19 – 64 years old	505
65 years old or older	430

The policy of any insured whose credit report was ordered by Allstate Property and Casualty Insurance Company for the purpose of Policy Group determination pursuant to this rule on or after 05/12/08 may, at Allstate's sole discretion, be assigned to Policy Group 8 retroactive to the most recent effective date of the policy, if such insured provides proof acceptable to Allstate that his or her credit information has been negatively impacted by any of the following extraordinary circumstances: divorce; death of a spouse or member of the same household; involuntary unemployment; catastrophic medical expense; care of adult dependent; identity theft; long-term injury, illness or disability; care of a dependent grandchild; or domestic violence.

B. SUBSEQUENT POLICY GROUP ASSIGNMENT

At each renewal, the same Policy Group will continue to apply unless at renewal one of the following applies:

1. Prior to every 2nd renewal effective date following the effective date of the policy for which credit report(s) were most recently ordered to determine the applicable Tier and only at the named insured's request, a new credit report(s) will be obtained for all applicable insureds on the policy at the time of reorder. The reorder will be done according to the procedure regarding ordering of credit reports that is in effect for Allstate Property and Casualty Insurance Company at the time of the reorder. If an insured requests a reorder, the next opportunity to request a reorder will take place prior to the 2nd renewal effective date following the effective date of the policy for which the credit report(s) was most recently ordered to determine the applicable Tier.

The policy of any insured whose credit report was ordered by Allstate Property and Casualty Insurance Company for the purpose of Policy Group determination pursuant to this rule on or after 05/12/08 may, at Allstate's sole discretion, be assigned to Policy Group 8 retroactive to the most recent effective date of the policy, if such insured provides proof acceptable to Allstate that his or her credit information has been negatively impacted by any of the following extraordinary circumstances: divorce; death of a spouse or member of the same household; involuntary unemployment; catastrophic medical expense; care of adult dependent; identity theft; long-term injury, illness or disability; care of a dependent grandchild; or domestic violence.

C. CREDIT REPORT REORDERS

In the event it is necessary to reorder any credit report(s) other than for reasons listed in Section B above, all credit reports needed to assign the policy to a Policy Group will be reordered. New credit report(s) will be obtained for all applicable insureds on the policy at the time of the reorder, according to the procedure regarding ordering of credit reports that is in effect for Allstate Property and Casualty Insurance Company at the time of the reorder, and the applicable Policy Group will be assigned as determined in Section A.